

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Implementation of Section 17
of the Cable Television
Consumer Protection and
Competition Act of 1992

Compatibility Between
Cable Systems and Consumer
Electronics Equipment

ET Docket No. 93-7

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COMMENTS OF SHARP ELECTRONICS CORPORATION

I. PREFACE

1.) Sharp Electronics Corporation (SHARP) hereby respectfully submits Comments in response to the above entitled Notice of Proposed Rule Making (NPRM), released December 1, 1993. This proceeding was instituted to develop necessary regulations for assuring compatibility between consumer electronics equipment and cable systems. These regulations will implement the statutory requirements set forth by Congress in Section 17 of the Cable Television Consumer Protection and Competition Act of 1992 (1992 Cable Act).

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2.) The objective of Section 17 of the 1992 Cable Act is to ensure compatibility between consumer equipment and cable systems, consistent with the need to prevent theft of cable service, so that cable subscribers will be able to enjoy the full benefits of programming available on cable systems and the functions available on their television receivers (TVs) and video cassette recorders (VCRs)

3.) SHARP is a leading manufacturer of TVs, VCRs, LCD-TVs, Projection TVs and other equipment which may be connected to cable systems. As an active participant in matters affecting the growth and future course of consumer electronics in the United States, SHARP has a direct interest in this proceeding. SHARP is presently involved in the industry activities which will lead to the establishment of industry standards, such as IS-6, the Decoder Interface Standard (successor to EIA/ANSI-563-1990), and other related consumer products standards.

4.) SHARP is pleased with the Commission's thoughtful and thorough effort in addressing Section 17 of the 1992 Cable Act. SHARP applauds the Commission's efforts to reduce consumer confusion resulting from the many different versions of cable boxes and remote control devices in the marketplace. The Commission's proposals for regulation will go a long way toward eliminating this confusion in the use of consumer electronics equipment connected to cable systems. The Commission's effort will greatly benefit U.S. consumers as well as cable service providers.

II SPECIFIC COMMENTS

5.) SHARP agrees with the Commission's proposals. With the specific suggestions for clarification set out in the following comments, SHARP fully supports the Commission's rule making proposals.

6.) SHARP requests that the Commission clarify portions of paragraph 20 of the NPRM.¹/1 . SHARP asks that the Commission clearly define the statement, "intended for connection to cable service" or that the terminology "intended for connection to cable service" be deleted.

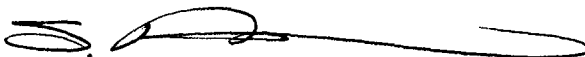
7.) It is common practice that manufacturers assign the "cable ready" designation to their products having that capability, and furnish appropriate descriptive information in instructional materials for the user and include appropriate references in the advertising for that product. It is crucial that manufacturers maintain the capability of determining, and thereby designating, which of their products meet the "cable ready" standards. By way of examples, small-sized TV receivers, VCRs intended for portable use, LCD Personal TV receivers, and Camcorders generally, will not be connected to cable services and will not be marked "cable ready" and should not be required to meet the "cable ready" specifications.

¹*/ NPRM, p. 10, par. 20

8.) A misreading of the new regulation that employs the terminology "intended for connection to cable service" could result in producing unnecessary and unintended requirements for extra interface connectors, special tuners, etc., to be included in such products. These requirements would greatly increase the cost of such products and would not provide any value or other benefit to consumers. Consequently, the new regulations should not employ the statement, or terminology, "intended for connection to cable service." Therefore, it would be particularly important for the Commission to clearly state that it intends that the new regulations only apply to consumer electronics equipment that is marketed as "cable ready."

9.) SHARP appreciates this opportunity to comment on these matters before the Commission.

Respectfully submitted,



SHARP ELECTRONICS CORPORATION

January 24, 1994

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